



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Guaranteed Organic Certification Agency
Est. Number:	N/A
Physical Address:	5464 Eight Street, Fallbrook, CA 92082
Mailing Address:	Same
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Auditor(s):	Miguel A. Caceres
Program:	USDA National Organic Program (NOP)
Audit Date(s):	March 27 – 29, 2007
Audit Identifier:	NP6335MMA
Action Required:	Yes
Audit Type:	Corrective Actions Audit
Audit Objective:	To verify that corrective actions adequately address the non-compliances identified during the 2006 Annual Update Audit
Audit Criteria:	7 CFR Part 205.510, National Organic Program; Final Rule, dated December 21, 2000, Amended September 11, 2006
Audit Scope:	Submitted corrective actions
Location(s) Audited:	Desk

Guaranteed Organic Certification Agency submitted corrective actions to the NOP and the corrective actions were forwarded to the auditor of record for review on March 22, 2007.

FINDINGS

Three of the five non-compliances were adequately addressed; however, 2 were not adequately addressed and remain outstanding.

NP6335MMA.NC3 – Major – Not Adequately Addressed – NOP §205.402(a)(2) states, “Upon acceptance of an application for certification, a certifying agent must: Determine by a review of the application materials whether the applicant appears to comply or may be able to comply with the applicable requirements of subpart C of this part.” *The updated Organic System Plan Packet, A017-6018 under “Nonagricultural Input Approval Worksheet” section states, “If nonagricultural ingredients or processing aids are used in the formulation and the input has been reviewed by OMRI or any other NOP accredited certifier, and determined to be compliant, please attach the compliancy document. If the input*



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*has not been previously reviewed please list below so that GOCA can determine compliance.” The training document, Application Coordinator Review Checklist, A034T-6059 under the “Material Review” section states, “Did you review all single ingredient materials to NOP and all brand name materials to OMRI or WA State and note findings on OSP?” The Final Rule requires the certifying agent to verify all ingredients and inputs identified in the organic production and handling system plan meet the standards and are used in accordance with the National List requirements. **Corrective Actions:** The response provided by GOCA stated that since the GOC Policy Manual GA007 was revised and thoroughly reviewed by the NOP and no non-compliance had been identified with the material review section it was determined to be compliant. The NOP has determined that the non-compliance as identified is valid. It is the accredited certifying agent’s (ACA) responsibility to verify that all ingredients and inputs utilized by an operation certified by that ACA are in compliance with the Final Rule and the National List. The response also stated that, “As with other review contractor’s, GOCA maintains a contractual agreement with the Organic Materials Review Institute (OMRI) as a subscriber ...GOCA accepts OMRI’s review of any brand name material that is in the current OMRI listing...” Again, this practice is not acceptable as all materials must be reviewed in accordance with the Final Rule and the National List by the ACA.*

NP6335MMA.NC4 – Major – Not Adequately Addressed – NOP §205.504(a)(2)(3) states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques...(a) Personnel. (2) The name and position description of all personnel to be used in the certification operation... (3) A description of the qualifications...” *The documents could not be reviewed for compliance to 205.501(a)(5) because not enough information was provided. Without knowing which specific categories (crops, livestock, etc.) of certification the personnel are responsible for, an adequate assessment could not be made. **Corrective Actions:** The corrective actions response stated that “GOCA has primarily been focused on evaluating skill sets in general based on GOCA’s primary client base, rather than differentiating skill sets that are scope specific.” The response also stated that “a two step development in training and record keeping has been implemented during the 2006 – 2007 accreditation year.” The attachments submitted for review of the corrective actions taken included a blank *Contractor Work Performance Evaluation*, GA 011 C-4350 CH, and the table of contents for the *GOCA Training Manual*, GA012-TOC. Without knowing which areas of certification the personnel have been involved with an adequate review of the documents originally submitted cannot be made and thus the non-compliance is not adequately addressed.*

NP6335MMA.NC1 – Major – Adequately Addressed – NOP §202.202(c) states, “Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as “organic” must: Have distinct, defined boundaries and buffer zones such as runoff to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.” *General client information: Dairy farm with 590 acres of crop land to be certified as organic on 3 different sites. Crops are hay and silage for own operation and livestock are not certified as of yet. In reference to the buffer zones the client was instructed to “Please describe how management practices verify compliance” as a condition to certification. The response from the client was that the neighbors had been notified of the organic practices on the certified parcels and requested to provide a 25 foot buffer along the fence lines and were also provided a “flyer outlining practices to prevent spray drift.” GOCA accepted the response and granted certification. This is not acceptable in*



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that the Final Rule requires that if the crop is to be represented as organic the organic system plan must include buffer zones and they must be verified during the inspection. Notifying the neighbor with an affidavit does not meet the requirements. **Corrective Actions:** The response stated that GOCA does not accept neighbor notification as a form of verifying buffer zones and that the maps identified the buffer zones which were verified during the inspection.

NP6335MMA.NC2 – Major – Adequately Addressed – NOP §205.401(c) states, “The application must include the following information: (c) The name(s) of any organic certifying agent(s) to which application has previously...and a description of the actions taken by the applicant to correct the non-compliances noted in the notification of non-compliance.” *The GOCA Application Packet, A011-5360 under “Application Instructions” states, “If the applicant has been involved previously with certification and voluntarily withdrew from the program, the answer would be “NO” to both of these questions. If the applicant withdrew from a previous application for any reason, if the application was denied, or if the applicant was suspended or revoked from an accredited certification program, NOP Section 205.401(c) requires that the applicant must provide...” The 2 statements on the instructions are contradictory. Depending on which information GOCA meant to provide to the client, the statement itself is in non-compliance.* **Corrective Actions:** The application packet was revised to remove the introduction page and the questions. The *GOCA Certification Application, A011-7005* was submitted for review.

NP6335MMA.NC5 – Major – Adequately Addressed – NOP §205.510(a) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following report and fees.” *GOCA was accredited on April 29, 2002 indicating that the Annual Report has to be submitted to the Administrator on or before April 29th of each subsequent year. The date on a letter from GOCA enclosed with the report and the date stamp of when the report was received by the NOP verified that it was not submitted until the end of August 2006.* **Corrective Actions:** GOCA stated they have implemented a project management system approach to reporting which relies on annual schedule dates and progress reporting and included a work plan for submitting the 5 year re-accreditation packet. The work plan included tasks, milestones, and progress report of the tasks. In order to allow the work plan to be implemented and tested this non-compliance will be considered adequately addressed. The submission of future annual reports and their submission dates will be closely monitored.